

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:) **Chapter 7**
) **Case No. 08-30513**
XECHEM, INC., et.al.,) **(Jointly Administered)**
) **Hon. Jack B. Schmetterer**
Debtors.) **Hearing Date: Thurs., June 26, 2014**
) **at 10:30 a.m.**

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Thursday, June 26, 2014 at 10:30 a.m.**, or as soon thereafter as may be possible, we shall appear before the **Honorable Jack B. Schmetterer** or any other Judge sitting in his stead, in **Courtroom 682**, of the Dirksen Federal Building, 219 South Dearborn, in Chicago, Illinois, and shall then and there present the attached **Application of Trustee for Authorization to pay Final Compensation and Reimbursement of Expenses to Trustee's Accountants**, a copy of which is hereby served upon you.

/s/ Norman B. Newman

Norman B. Newman, Trustee

Norman B. Newman, ARDC No. 02045427
MUCH SHELIST, P.C.
191 North Wacker Drive, Suite 1800
Chicago, Illinois 60606
Telephone: 312.521.2000
Facsimile: 312.521.2100

CERTIFICATE OF SERVICE

Norman B. Newman, an attorney, hereby certifies that on May 22, 2014, he electronically filed this Application for Compensation with the Clerk of the Court via the Court's CM/ECF system which will send electronic notification to those individuals registered to receive notice.

/s/Norman B. Newman

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:) **Chapter 7**
) **Case No. 08-30513**
XECHEM, INC., et.al.,) **(Jointly Administered)**
) **Hon. Jack B. Schmetterer**
Debtors.) **Hearing Date: Thurs., June 26, 2014**
) **at 10:30 a.m.**

**APPLICATION OF TRUSTEE FOR
AUTHORIZATION TO PAY FINAL COMPENSATION
AND REIMBURSEMENT OF EXPENSES TO TRUSTEE'S ACCOUNTANTS**

Norman B. Newman, Trustee herein (the "Trustee"), moves this Court for authorization to pay Miller Cooper & Co., Ltd., ("Miller Cooper") the Trustee's accountants, final compensation and reimbursement of expenses under §§330 and 331 of the Bankruptcy Code and Bankruptcy Rule 2016. In support of his motion, the Trustee respectfully states as follows:

1. On November 9, 2008, the Debtors filed their petitions for relief under Chapter 11 of the Bankruptcy Code.
2. On December 2, 2008, an Order was entered providing for joint administration of the Debtors' case under the above-referenced case number.
3. On March 7, 2011, the Debtors' Chapter 11 cases were converted to cases under Chapter 7 of the Bankruptcy Code. Trustee was subsequently appointed, qualified and continues to serve as the trustee herein.
4. On January 24, 2014, this Court entered an Order authorizing the Trustee to employ Miller Cooper as accountants for the Trustee.

5. Based on the time value of the services rendered, Miller Cooper is entitled to receive final compensation in the amount of \$2,799.00 plus reimbursement of out-of-pocket expenses in the amount of \$421.00 for services rendered on behalf of the Trustee.

6. Other than is permitted under Section 504 of the Bankruptcy Code, Miller Cooper has no agreement with any other person or firm with regard to its compensation in this case.

7. At all times relevant hereto, Miller Cooper provided accounting services in the most efficient and cost effective manner.

8. Miller Cooper expended 11.70 hours of services assisting the Trustee in the preparation of final federal and state tax income returns for the years 2008 and 2012. A statement of services rendered for this task is attached hereto as Exhibit "A". The individuals involved in this activity and the time expended by them are as follows:

Accountant	Hours Expended	Total
Chuck Cohen	.50 hrs.	186.00
Avrum Katz	2.50 hrs.	930.00
Tara Hibbard	3.00 hrs.	831.00
Chava Merzel	5.40 hrs.	810.00
Courtney Dunn	.30 hrs.	42.00
TOTAL:	11.70 hrs.	\$2,799.00

9. Miller Cooper also expended a total of \$421.00 in out-of-pocket expenses on computer service charges. This expense is also listed on Exhibit "A".

10. The services were rendered in connection with and in furtherance of assisting Trustee in the performance of his duties as delineated by Section 704 of the Bankruptcy Code.

11. The services rendered by Miller Cooper provided a benefit to Trustee and to the creditors of this estate.

WHEREFORE, Trustee respectfully prays that this Court enter an Order as follows:

1. Awarding Miller Cooper final compensation in the amount of \$2,799.00 for services rendered plus reimbursement of out-of-pocket expenses in the amount of \$421.00;
2. Authorizing Trustee to pay same forthwith as a Chapter 7 expense of administration of this estate; and
3. Granting such other and further relief as this Court deems appropriate.

Respectfully submitted,

/s/ Norman B. Newman

Norman B. Newman, Chapter 7 Trustee
for the bankruptcy estate of Xechem Inc.

Norman B. Newman (Atty. ID# 02045427)
Much Shelist, P.C.
191 N. Wacker Drive, Suite 1800
Chicago, IL 60606
(312) 521-2000

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:) **Chapter 7**
) **Case No. 08-30513**
XECHEM, INC., et.al.,) **(Jointly Administered)**
) **Hon. Jack B. Schmetterer**
Debtors.)

COVER SHEET FOR APPLICATION FOR PROFESSIONAL SERVICES

Name of Applicant: Miller Cooper & Co., Ltd.

Authorized to provide professional services to: Norman B. Newman, Chapter 7 Trustee

Date of Order Authorizing Employment: January 24, 2014

Period for which compensation is sought: 06/04/12 through 2/28/14

Amount of fees sought: \$2,799.00

Amount of expense reimbursement sought: \$421.00

Retainer previously received: \$0.00

This is a(n): Interim Application Final Application

Prior fee applications:

Date Filed	Period Covered	Total (Fees and Expenses)	Requested	Total Allowed	Any Ordered	Amount Withheld

The aggregate amount of fees and expenses *paid* to the Applicant to date for services rendered and expenses incurred herein is: \$0.00

Dated: 5/22/14

Miller Cooper & Co., Ltd.

By: /s/Norman B. Newman